

**Federal Defenders
OF NEW YORK, INC.**

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Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

November 12, 2021

BY ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

**Re: United States v. Jonas Brito
20 Cr. 200 (KMW)**

Dear Judge Wood:

I write to request a temporary bail modification for Jonas Brito in the above-captioned case to allow Mr. Brito to remain in the Southern District of New York today and return home to Pennsylvania tomorrow, Saturday, November 13. Pretrial services consents to this request; the Government does not object.

On February 27, 2020, Mr. Brito was presented in Magistrate Court and the defense reserved its bail argument; Mr. Brito was detained. On March 16, 2020, at the defense's request, Magistrate Court held a contested bail hearing for Mr. Brito. Magistrate Judge Stewart D. Aaron denied bail; Mr. Brito remained incarcerated at the Metropolitan Correctional Center.

On April 3, 2020, with the consent of the Government, the Court granted Mr. Brito bail. Doc. 12. The following bail conditions were set and subsequently met:

\$25,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pretrial supervision as directed, with monitoring for the first 14 days of release by voice verification over a land line, a third party custodian, daily FaceTime check-in; return to the Pretrial Services Office for the installation of electronic monitoring equipment; surrender of travel documents with no new applications and travel restricted to the Southern District of New York and the Eastern District of New York.

On April 8, 2020, Mr. Brito reported to the Pretrial Services Office and was enrolled in location monitoring. On May 11, 2020, the Court granted the parties' joint request for removal of GPS location monitoring as a condition of Mr. Brito's release. Doc. 16.

On February 10, 2021, with consent of the defense and the Government, the Court granted Pretrial's request to modify the conditions of Mr. Brito's release to include substance abuse testing/treatment and mental health treatment as directed by Pretrial Services and an expansion of travel restrictions to include Pennsylvania for treatment-related purposes only. Doc. 31.

On March 23, 2021, following Mr. Brito's successful completion of residential treatment in Pennsylvania, the Court granted Mr. Brito's request to remain in Pennsylvania with his significant other while he receives outpatient treatment and be supervised by the Middle District of Pennsylvania. Doc. 38.

On November 4, 2021, the Court granted Mr. Brito permission to travel to the Southern District of New York on Thursday, November 11 and return to Pennsylvania after his plea hearing on Friday, November 12. Earlier today, Mr. Brito pled guilty in person before Magistrate Judge Fox. Mr. Brito would like to spend the remainder of the day with his family in New York before returning home to Pennsylvania. Accordingly, Mr. Brito respectfully requests a temporary bail modification to allow him to return home tomorrow, Saturday, November 13. Pretrial services consents to this request; the Government does not object.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Marne Lenox
Assistant Federal Defender
(212) 417-8721

Cc: AUSA Peter Davis (via email)

SO ORDERED: N.Y., N.Y. 11/12/21



KIMBA M. WOOD
U.S.D.J.